

Exhibit A

**IN THE CIRCUIT COURT OF SHELBY COUNTY, TENNESSEE
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS**

| | | |
|--|---|------------------------------|
| DANIEL TRIPLETT, | } | |
| | } | |
| Plaintiff, | } | |
| | } | Civil Action No.: CT-1752-22 |
| v. | } | |
| | } | |
| LANIE D. HEARN; | } | JURY TRIAL DEMANDED |
| UNIVERSAL PROTECTION SERVICE, LLC; | } | |
| MICHAEL STAPLETON ASSOCIATES, LTD., | } | |
| CORPORATION; PEOPLEMARK, INC.; | } | |
| PEOPLEMARK LLC; ALLIED UNIVERSAL | } | |
| (Technology Services) aka Securadyne Systems | } | |
| Intermediate LLC; JOHN DOES A-D, | } | |
| | } | |
| Defendants. | } | |

**DEFENDANTS UNIVERSAL PROTECTION SERVICE, LLC d/b/a ALLIED
UNIVERSAL SECURITY SERVICES, LLC AND LANIE D. HEARN'S ANSWER AND
AFFIRMATIVE DEFENSES TO COMPLAINT**

COMES NOW, Defendants Lanie D. Hearn and Universal Protection Service, LLC d/b/a Allied Universal Security Services, LLC (i/p/a "Allied Universal (Technology Services) aka Securadyne Systems Intermediate LLC") (collectively, "Defendants"), by and through the undersigned counsel, and hereby file this Answer and Affirmative Defenses to Plaintiff Daniel Triplett's Complaint, showing this Honorable Court as follows:

ANSWER

PARTIES, JURISDICTION AND VENUE

1. Defendants are without sufficient knowledge or information upon which to form a belief as to the truth of the allegations contained in this Paragraph of the Complaint; therefore, these allegations stand denied.

2. Defendants admit only that Lanie D. Hearn is an adult resident of Memphis, Tennessee. As to the remainder of the allegations contained in this Paragraph of the Complaint, these allegations stand denied.

3. Defendants deny that Universal Protection Service, LLC's principal office is located at 1551 N. Tustin Ave. Ste. 650, Santa Ana, CA 92705-8664. As to the remainder of the allegations contained in this Paragraph of the Complaint, these allegations are admitted.

4. As the allegations contained in this Paragraph of the Complaint are not directed toward Defendants, no response of Defendants is required. However, to the extent this Paragraph contains allegations directed toward Defendants, these allegations stand denied.

5. As the allegations contained in this Paragraph of the Complaint are not directed toward Defendants, no response of Defendants is required. However, to the extent this Paragraph contains allegations directed toward Defendants, these allegations stand denied.

6. As the allegations contained in this Paragraph of the Complaint are not directed toward Defendants, no response of Defendants is required. However, to the extent this Paragraph contains allegations directed toward Defendants, these allegations stand denied.

7. Defendants admit only that the proper entity name for Allied Universal is Universal Protection Service, LLC d/b/a Allied Universal Security Services, LLC which is a Delaware limited liability company with a principal place of business in Pennsylvania. As to the remainder of the allegations contained in this Paragraph of the Complaint, these allegations stand denied.

8. As the allegations contained in this Paragraph of the Complaint are not directed toward Defendants, no response of Defendants is required. However, to the extent this Paragraph contains allegations directed toward Defendants, these allegations stand denied.

9. This Paragraph of the Complaint states a legal conclusion to which no response of Defendants is required. To the extent a response is required, Defendants are without sufficient knowledge or information upon which to form a belief as to the truth of the allegations contained in this Paragraph of the Complaint; therefore these allegations stand denied.

FACTS

10. Defendants are without sufficient knowledge or information upon which to form a belief as to the truth of the allegations contained in this Paragraph of the Complaint; therefore, these allegations stand denied.

11. Defendants admit only that a vehicle collision between the vehicle operated by Plaintiff and the vehicle operated by Defendant Lanie D. Hearn occurred and that at the time of the incident, Lanie D. Hearn was an employee of Defendant Universal Protection Service, LLC d/b/a Allied Universal Security Services, LLC. As to the remainder of the allegations contained in this Paragraph of the Complaint, Defendants are without sufficient knowledge or information upon which to form a belief as to the truth of the allegations contained in this Paragraph of the Complaint; therefore, these allegations stand denied.

NEGLIGENCE

12. Defendants incorporate its responses to Paragraphs 1-11 of the Complaint as if fully set forth herein. Defendants deny the allegations of negligence alleged against them as contained in this Paragraph of the Complaint.

13. This Paragraph of the Complaint states a legal conclusion to which no response of Defendants is required. To the extent a response is required, these allegations stand denied.

14. This Paragraph of the Complaint states a legal conclusion to which no response of Defendants is required. To the extent a response is required, these allegations stand denied.

15. This Paragraph of the Complaint states a legal conclusion to which no response of Defendants is required. To the extent a response is required, these allegations stand denied.

16. This Paragraph of the Complaint states a legal conclusion to which no response of Defendants is required. To the extent a response is required, these allegations stand denied.

17. This Paragraph of the Complaint states a legal conclusion to which no response of Defendants is required. To the extent a response is required, these allegations stand denied.

PROXIMATE CAUSE

18. This Paragraph of the Complaint states a legal conclusion to which no response of Defendants is required. To the extent a response is required, these allegations stand denied.

DAMAGES

19. This Paragraph of the Complaint states a legal conclusion to which no response of Defendants is required. To the extent a response is required, Defendants deny Plaintiff is entitled to damages from Defendants and deny Plaintiff's allegations of negligence.

Defendants deny all allegations in the "Wherefore" and/or *ad damnum* Paragraph of the Complaint. Any and all remaining allegations contained in Plaintiff's Complaint not expressly admitted herein are likewise denied.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

Upon information and belief, the Complaint herein, or a part thereof, fails to state a cause of action against Defendants upon which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

Upon information and belief, Plaintiff's damages, if any, were not proximately caused by any act, error, or omission of Defendants as a matter of law.

THIRD AFFIRMATIVE DEFENSE

Upon information and belief, if any damages were sustained by Plaintiff as alleged in Plaintiff's Complaint, which damages are expressly denied, all such damages have been caused or were brought about, in whole or in part, by the affirmative wrongdoing, negligence, want of care, omissions, failure to mitigate damages, or other culpable conduct or comparative negligence of the Plaintiff and such persons other than Defendants, without the affirmative acts of Defendants contributing thereto, and as a consequence thereof, Plaintiff's damages, if any, should be reduced or barred by the Plaintiff's comparative fault in causing the alleged damages.

FOURTH AFFIRMATIVE DEFENSE

Upon information and belief, any injuries or damages claimed were caused, in whole or in part, by the negligence or other culpable conduct of third parties over which Defendants has no control or right to exercise such control; therefore, Plaintiff's Complaint should be dismissed or Plaintiff's damages reduced accordingly.

FIFTH AFFIRMATIVE DEFENSE

Upon information and belief, the accident, and injuries, if any, sustained by the Plaintiff, resulted and arose solely and exclusively from and were proximately caused and produced by Plaintiff's own carelessness, negligence, recklessness, intentional conduct and unlawful reckless conduct on the date in question.

SIXTH AFFIRMATIVE DEFENSE

No acts or omissions by Defendants were an actual cause, legal cause, contributing cause, substantial factor, or proximate cause with respect to the damages, if any, sustained by Plaintiff.

SEVENTH AFFIRMATIVE DEFENSE

The causes of action asserted against Defendants are precluded because the damages, if

any, sustained by Plaintiff were solely and proximately caused by superseding causes and/or by independent intervening causes outside the control of Defendants.

EIGHTH AFFIRMATIVE DEFENSE

That the contributory/comparative negligence of the Plaintiff has barred him from relief against Defendants. The accident occurred entirely as a result of Plaintiff's own conduct, and Plaintiff is guilty of contributory/comparative negligence as a result thereof, in whole or in part.

NINTH AFFIRMATIVE DEFENSE

Defendants allege that the Plaintiff did not exercise ordinary care, caution, or prudence to avoid the incidents complained of herein, and said incidents and the injuries and damages, if any, sustained by Plaintiff, were directly and proximately caused and contributed to by the carelessness and negligence of Plaintiff.

TENTH AFFIRMATIVE DEFENSE

Defendants exercised due care and diligence in all of the matters alleged in the Complaint, and no act or omission by Defendants was the proximate cause of any damage, injury or loss to Plaintiff.

ELEVENTH AFFIRMATIVE DEFENSE

Defendants allege that the Plaintiff's alleged injuries were the result of an avoidable accident, and not due to any negligence or breach of legal duty on the part of Defendants.

TWELFTH AFFIRMATIVE DEFENSE

Defendants allege, in the alternative, that Plaintiff's injuries are indivisible injuries. To the extent that Plaintiff has received benefits from certain collateral sources and have been made whole, in any way, such recovery serves as a bar to any indivisible injury of Plaintiff

THIRTEENTH AFFIRMATIVE DEFENSE

To the extent that Plaintiff has agreed not to sue or have compromised, settled or otherwise reached some arrangement with any other party, then such is a complete bar to this action as satisfaction thereof. In the alternative, should the Court find this not to be a bar, the jury should be advised of the agreements of Plaintiff and any monetary amounts involved so that Defendants can be credited with or receive an offset for said amounts Plaintiff has already received so as to prevent “double recovery” by Plaintiff.

FOURTEENTH AFFIRMATIVE DEFENSE

Plaintiff’s negligence exceeded the negligence of any other party who may have caused or contributed to the incident which resulted in Plaintiff’s damages. Therefore, Plaintiff’s claims are barred.

FIFTEENTH AFFIRMATIVE DEFENSE

Any claim for injuries, damages or losses may be barred or diminished under the doctrine of comparative fault.

SIXTEENTH AFFIRMATIVE DEFENSE

Defendants hereby reserve the right to supplement its affirmative defenses at any time prior to trial.

WHEREFORE, having fully answered the Complaint, Defendants Lanie D. Hearn and Universal Protection Service, LLC d/b/a Allied Universal Security Services, LLC (i/p/a “Allied Universal (Technology Services) aka Securadyne Systems Intermediate LLC”) hereby pray for the following relief from this Honorable Court:

1. that the Complaint be dismissed;
2. For trial by full jury;

3. For all costs and fees associated with this action to be taxed against Plaintiff; and
4. For such other and further relief as this Honorable Court deems just and proper.

DEFENDANTS HEREBY DEMAND A TRIAL BY JURY OF TWELVE.

Respectfully submitted this 29th day of June, 2022

**WILSON ELSER MOSKOWITZ
EDELMAN & DICKER, LLP**

/s/ Megan R. Calme

100 Mallard Creek Road
Suite 250
Louisville, KY 40207
502-238-8500 (Main)
502-238-7995 (Fax)
james.burd@wilsonelser.com
Megan.calme@wilsonelser.com

Megan R. Calme, Esq.
BPR No. 038145
James Burd, Esq.
BPR No. 034940
Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that the within and foregoing Answer and Affirmative Defenses electronically filed with the clerk of the court for Shelby County, TN, along with a copy sent via U.S. Mail to the following:

Jamie W. Howell, Jr.
Charles N. Smith
Chathan Gilder Howell Pittman PLLC
291 Losher Street
Hernando, MS 38632
Attorneys for Plaintiff

Respectfully submitted this 29th day of June, 2022

/s/ Megan R. Calme

Megan R. Calme

**IN THE CIRCUIT COURT OF SHELBY COUNTY, TENNESSEE
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS**

DANIEL TRIPLETT

PLAINTIFF

VS.

CAUSE NO.:

**LANIE D. HEARN;
UNIVERSAL PROTECTION SERVICE, LLC.;
MICHAEL STAPLETON ASSOCIATES, LTD., CORPORATION;
PEOPLEMARK, INC.;
PEOPLEMARK LLC;
ALLIED UNIVERSAL(Technology Services) aka
Securadyne Systems Intermediate LLC;
JOHN DOES A-D**

DEFENDANTS

COMPLAINT - JURY TRIAL DEMANDED

COMES NOW Plaintiff, Daniel Triplett, by and through undersigned counsel, Charles N. Smith, Jamie W. Howell both of Chatham Gilder Howell Pittman, PLLC, Hernando, Mississippi and files this Complaint for damages against the Defendants Lanie D. Hearn, Universal Protection Service, LLC; MSA(Michael Stapleton Associates), LTD., Corporation; Peoplemark INC.; Peoplemark LLC; ALLIED UNIVERSAL and John Does A-D and would show the following in support:

PARTIES, JURISDICTION AND VENUE

1. The Plaintiff, Daniel Triplett, is an adult resident citizen of Desoto County, Mississippi.
2. The Defendant, Lanie D. Hearn, is an adult resident citizen of Memphis, Shelby County, Tennessee, who may be served at 2528 Northumberland Lane., Memphis, TN 38128-4729.
3. The Defendant, UNIVERSAL PROTECTION SERVICE, LLC, is a Limited Liability Company doing business in the State of Tennessee and whose principal office is 1551 N TUSTIN AVE, STE 650, SANTA ANA, CA 92705-8664 and whose agent for service of process is CORPORATION SERVICE COMPANY, 2908 POSTON AVE, NASHVILLE, TN 37203-1312.
4. The Defendant, MICHAEL STAPLETON ASSOCIATES, LTD., CORPORATION, is a

Limited Liability Company doing business in the State of Tennessee and whose principal office is OFFICE OF GENERAL COUNSEL, 9 MURRAY, FL 3, NEW YORK, NY 10007-2272 and whose agent for service of process is CT CORPORATION SYSTEM, 300 MONTVUE RD., KNOXVILLE, TN 37919-5546.

5. The Defendant, PEOPLEMARK, INC., is a Limited Liability Company doing business in the State of Tennessee and whose principal office is 1551 N TUSTIN AVE, STE 650, SANTA ANA, CA 92705-8664 and whose agent for service of process is CORPORATION SERVICE COMPANY, 2908 POSTON AVE, NASHVILLE, TN 37203-1312.

6. The Defendant, PEOPLEMARK, LLC, is a Limited Liability Company doing business in the State of Tennessee and whose principal office is 1551 N TUSTIN AVE, STE 650, SANTA ANA, CA 92705-8664 and whose agent for service of process is CORPORATION SERVICE COMPANY, 2908 POSTON AVE, NASHVILLE, TN 37203-1312.

7. The Defendant, ALLIED UNIVERSAL, is a Corporation doing business in the State of Tennessee and whose principal office is Eight Tower Bridge, 161 Washington Street Suite 600, Conshohocken, Pennsylvania 19428 and headquartered at 1551 N. TUSTIN AVE, STE 650, SANTA ANA, CA 92705-8664 and whose agent for service of process is CORPORATION SERVICE COMPANY, 2908 POSTON AVE, NASHVILLE, TN 37203-1312.

8. Defendants John Does A-D are unknown individuals and/or entities that are liable to Plaintiff as alleged herein. The names and capacities of Defendants John Does A-D are inclusive, whether individual, corporate, or otherwise, and are presently unknown to Plaintiff, who sued said Defendants by fictitious names, and will further seek leave of this Honorable Court to amend this Complaint to show their true names and capacities when the same are ascertained. Plaintiff alleges upon information and belief that each of the Defendants designated herein as a Doe is responsible in some manner and liable herein to Plaintiff by reason of their tortious and wanton actions and/or in some other

manner whether alleged herein in this complaint or not, and by such wrongful conduct, said Defendants, each of them, proximately caused and/or contributed to injury and damage occasioned to Plaintiff herein.

9. Jurisdiction and venue are appropriate in this court as the allegations which form the basis of this suit occurred in Shelby County, Tennessee, and the Defendant, Lanie Hearn, is a resident citizen of the State of Tennessee while each of the named business Defendants being Universal Protection Service, LLC; MSA(Michael Stapleton Associates), LTD., Corporation; Peoplemark INC.; Peoplemark LLC and Allied Universal; and John Does A-D conduct business and/or are registered entities in the state of Tennessee.

FACTS

10. That on or about May 12, 2021 at approximately 11:25 a.m., the Plaintiff, Daniel Triplett, was safely operating his automobile traveling Westbound on Democrat Road in the left lane while obeying all traffic laws.

11. That the Defendant, Lanie D. Hearn, who was pulling out of a private drive, failed to maintain a safe look out and pulled out in front of Mr. Triplett who was traveling Westbound on Democrat Road in the left lane. The vehicle driven by Ms. Hearn struck the front bumper of Mr. Triplett's truck. Ms. Hearn's vehicle sustained damage to the rear passenger side wheel well, rear passenger door, and rear quarter panel, while damaging the front of Mr. Triplett's truck. Ms. Hearn, at the time of the accident, was an employee and/or agent of one or more of the named Defendants and at all pertinent times hereto acting within the scope and course of her agency and/or employment.

NEGLIGENCE

12. Plaintiff incorporates herein as if set out verbatim all assertions contained in paragraphs 1-11 above and brings his cause of action against the defendants in tort and under the theory of negligence in that the negligence of the Defendants as set out in this Complaint was the proximate cause of the collision and subsequent injuries to the Plaintiff.

13. At all material times herein, Defendant, Lanie D. Hearn, owed a duty to operate her vehicle in the manner of a reasonable prudent driver under similar or like circumstances so as to avoid endangering other drivers including the Plaintiff, Daniel Triplett. The Defendant breached this duty.

14. Defendant, Lanie Hearn, was, at all pertinent times hereto, an employee and/or agent of the Defendants, Universal Protection Service, LLC; MSA (Michael Stapleton Associates), LTD., Corporation; Peoplemark INC.; Peoplemark LLC; ALLIED UNIVERSAL and John Does A-D, and was driving a vehicle carrying out her duties in furtherance of the named Defendants' business with its permission and consent and specifically for its business purposes. Thus, the Defendants, Universal Protection Service, LLC; MSA (Michael Stapleton Associates), LTD., Corporation; Peoplemark INC.; Peoplemark LLC; ALLIED UNIVERSAL and John Does A-D, are vicariously liable for the actions of the Defendant, Lanie Hearn, under the doctrines of: Respondeat Superior, Agency, and/or Master/Servant.

15. The Defendant, Lanie Hearn, violated and failed to fulfill certain duties owed to Plaintiff, Daniel Triplett, and was guilty of the following acts of negligence:

- a.) failure to maintain a good and proper lookout;
- b.) in operating her vehicle in a reckless manner;
- c.) in having total disregard for the lives and safety for the Plaintiff and others who were traveling on Democrat Road at that date and time;
- d.) in failing to maintain proper control of her vehicle;
- e.) in failing to take proper evasive action to avoid a collision with another vehicle;
- f.) in failing to give full attention to vehicle operation;
- g.) failure to exercise reasonable care under the circumstances then existing;
- h.) negligently and carelessly and recklessly driving her vehicle in a reckless manner under the existing conditions;

i.) other violations which may be shown to have occurred that re discovered after the filing;

16. At the time and place of the collision, the following statutes of the State of Tennessee were in full force and effect and were violated by the Defendant, to wit:

- a. Tennessee Code Annotated (T.C.A.) § 55-8-109. Traffic control devices; obedience;
- b. T.C.A. § 55-8-110. Traffic control signals;
- c. T.C.A. § 55-10-101. Death or personal injury;
- d. T.C.A. § 55-10-102. Vehicular damage;
- e. T.C.A. § 55-8-136. Due care;
- f. T.C.A. § 55-8-197. Failure to yield right of way resulting in serious bodily injury or death; and
- g. T.C.A. § 55-10-205. Reckless Driving.
- h. T.C.A. 55-8-103 Required obedience to Traffic Laws;

17. At the time and place of the collision, the following ordinances of the City of Memphis were in full force and effect and were violated by the Defendant, to wit:

- a) Sec. 11-12-13. Obedience to Devices;
- b) Sec. 11-16-2. Duty to Devote Full Time and Attention to Operating Vehicle;
- c) Sec. 11-16-3. Duty to Drive at a Safe Speed, Maintain Lookout and Keep Vehicle Under Control;
- d) Sec. 11-16-44. Reckless Driving;

PROXIMATE CAUSE

18. The negligence of the Defendant was the proximate cause of the accident and the resultant injuries and damages to the Plaintiff.

DAMAGES

19. That as a direct and proximate result of Defendants' negligence, the Plaintiff, has been caused to suffer and incur severe and painful physical injuries and damages, including, but not limited to the following, to-wit:

- a. Bodily injuries caused, precipitated, and/or aggravated by the wrongs complained of by the Plaintiff, past, present, and future;
- b. Physical pain and suffering, past, present, and future;
- c. Mental and emotional anguish, anxiety, depression, distress, and suffering, past present, and future;
- d. Hedonic damages for the impairment and loss of enjoyment of the normal pleasures of life, past, present, and future; as well as
- e. Medical expenses, past, present, and future; and
- f. Permanent bodily impairment;
- g. Loss of wages.

WHEREFORE PREMISES CONSIDERED, the Plaintiff demands a trial by jury and a Judgment of and from the Defendants in the amount of One Million Dollars (\$1,000,000) on behalf of Daniel Triplett and for any other relief deemed appropriate by the Court, which will adequately compensate the Plaintiff for all injuries and damages allowed by law and to be determined by the jury including pre-judgment and post-judgment interest. Plaintiff prays for leave of court to amend his Complaint in the event that additional facts are discovered which may warrant consideration of additional damages.

PLAINTIFFS DEMANDS A JURY TO TRY THE ISSUES WHEN JOINED.

Respectfully submitted,
CHATHAM GILDER HOWELL PITTMAN PLLC

BY: 

JAMIE W. HOWELL JR., TN Bar# 016361
Attorney for Daniel Triplett
291 Loshier Street
Hernando, MS 38632
662-429-1027

Chatham Gilder Howell Pittman PLLC

BY: 

CHARLES N. SMITH, TN Bar#029398
Attorney for Daniel Triplett
291 Loshier Street
Hernando, MS 38632
662-429-1027

**IN THE CIRCUIT COURT OF SHELBY COUNTY, TENNESSEE
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS**

DANIEL TRIPLETT

PLAINTIFF

VS.

CAUSE NO.:

**LANIE D. HEARN;
UNIVERSAL PROTECTION SERVICE, LLC;
MICHAEL STAPLETON ASSOCIATES, LTD., CORPORATION;
PEOPLEMARK, INC.;
PEOPLEMARK LLC;
ALLIED UNIVERSAL
JOHN DOES A-D**

DEFENDANTS

**PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS AND REQUESTS FOR ADMISSION
PROPOUNDED TO DEFENDANTS, LANIE D. HEARN; UNIVERSAL PROTECTION
SERVICE, LLC; MICHAEL STAPLETON ASSOCIATES, LTD., CORPORATION;
PEOPLEMARK, INC.; PEOPLEMARK LLC; ALLIED UNIVERSAL; AND JOHN DOES
A-D**

COMES NOW the Plaintiff, Daniel Triplett, by and through Counsel, Charles N. Smith, and Jamie W. Howell of Chatham Gilder Howell Pittman and propounds the following Interrogatories and Production of Documents Propounded to the Defendants, LANIE D. HEARN; UNIVERSAL PROTECTION SERVICE, LLC; MICHAEL STAPLETON ASSOCIATES, LTD., CORPORATION; PEOPLEMARK, INC.; PEOPLEMARK LLC; ALLIED UNIVERSAL; AND JOHN DOES A-D, to be answered under oath in accordance with the Tennessee Rules of Civil Procedure.

A. These Interrogatories are continuing in character as to require you to file supplementary answers if you obtain further or different information before trial.

B. Where the name or identity of a person is requested, please state full name, home address, and also business address, if known.

C. Unless otherwise indicated, these Interrogatories refer to the time, place and circumstances of the occurrence mentioned or complained of in the pleadings.

D. Where knowledge or information or possession of a party is requested, such request includes knowledge of the party's agents, representatives, and unless privileged, his attorneys. When answer is made by a corporate defendant, state the name, address and title of the person supplying the information, and make the Affidavit, and the source of his information.

E. The pronoun "you" refers to the party to whom these Interrogatories are addressed, and the persons mentioned in Clause "D".

INTERROGATORIES

INTERROGATORY NO. 1: Please state your full name, address, and present and past employer, including employer at the time of the accident referenced in the complaint accompanying these requests, and whether you assert that another person or entity is responsible for the damages and negligence in the Complaint served upon you or the entity you represent is an employer of Lanie D. Hearn or she was acting as their agent.

INTERROGATORY NO. 2: State whether or not you were the operator or an occupant of a vehicle that was involved in a collision with the Plaintiff on or about May 12, 2021.

INTERROGATORY NO. 3: If you maintain that Lanie Hearn is not an employee or agent of yours or that we have failed to correctly name her employer or for whom she was an agent, then please identify the party who is her employer or for whom she was an agent.

INTERROGATORY NO. 4: State the name and address of each person, including experts, having any knowledge of relevant facts related to the collision that is the basis of this suit, its cause, or the damages resulting from it.

INTERROGATORY NO. 5: State the name and address of any potential party to this lawsuit who is not already a party whose presence is needed for just adjudication or who is a real party in interest.

INTERROGATORY NO. 6: State the name, address, and qualifications of each expert whom you expect to call as an expert witness at the trial of this case, and the subject matter concerning which the expert expects to testify. Also, attach a copy of any report, including factual observations and opinions, that has been prepared by any such expert.

INTERROGATORY NO. 7: Please state whether you have a copy of any statement that any agents of the Plaintiff or the Plaintiff have previously made concerning the action or its subject matter and that is in your possession, custody, or control.

For the purpose of this question, a statement previously made is (1) a written statement signed or otherwise adopted or approved by the person making it, or (2) a stenographic, mechanical, electrical or other recording, or a transcription that is a substantially verbatim recital of an oral statement by the person making it and contemporaneously recorded.

INTERROGATORY NO. 8: Describe in your own words how the collision occurred.

INTERROGATORY NO. 9: State specifically and in detail what the claim or contention of the Defendant will be regarding any cause or contributing cause by the Plaintiff to the collision, if any, including a statement in detail of the facts or information upon which this contention is based.

INTERROGATORY NO. 10: State the speed of your vehicle at all times material to the collision in question, including specifically your speed as you approached the intersection before striking the Plaintiff. If your brakes were on at the time of impact, please state your speed before applying your brakes.

INTERROGATORY NO. 11: State in detail what intoxicating beverages, if any, you

had consumed and what drugs, medications, if any, you had taken during the 24-hour period immediately preceding the collision.

INTERROGATORY NO. 12: Describe in detail what injuries, if any, you received in the collision.

INTERROGATORY NO. 13: Please State the amount of property damage both monetary cost and physical damage sustained to the vehicle you were operating in the collision complained of.

INTERROGATORY NO. 14 Describe in detail any conversations you or your representative have had with the Plaintiff's representative following the collision in question.

INTERROGATORY NO. 15: Describe any information you have indicating or any reason you have to believe, if any, that there was any defect or failure on the part of any vehicle or equipment involved in the collision.

INTERROGATORY NO. 16: Describe any traffic citation you received as a result of this collision by stating the name and location of the Court involved, the violations of the law charged in that citation and the date, place, and manner (i.e., type of plea, bail, forfeit, trial, etc.) of disposition of the citation.

INTERROGATORY NO. 17: State whether you were acting within the course and scope of any agency, employment, or service at the time of the collision and describe the type of relationship with the persons involved.

INTERROGATORY NO. 18: If you contend you were confronted with a sudden emergency, please:

- A. identify each and every fact in support of such contention;
- B. identify each and every document in support of such contention or relative to

such contention;

- C. identify each and every individual who would be knowledgeable of this contention and/or whom you intend to call as a witness in support thereof.

INTERROGATORY NO. 19: If you contend the Plaintiff was contributorily negligent and that said contributory negligence was the proximate or contributing cause of the collision, please:

- a. identify each and every fact in support of such contention;
- b. identify each and every document in support of such contention or relative to such contention;
- c. identify each and every individual who would be knowledgeable of this contention and/or whom you intend to call as a witness in support thereof.

INTERROGATORY NO. 20: If you have been involved in any other motor vehicle accidents since you were 16 years old, please describe when such accident(s) occurred and give a brief summary of who was driving and what happened to cause the accident(s).

INTERROGATORY NO. 21: Together with the foregoing interrogatories, the Plaintiff has propounded upon this Defendant Request for Production. As to any Interrogatory or Request for Production which you have not answered or withheld from production on the ground that (i) it was prepared in anticipation of litigation for trial; (ii) it is work product, or (iii) it is privileged, please identify each such documents and or tangible thing and answer the following concerning such:

- a. description of what the document is;

- b. name, address and employer of the author of the document, or person taking the statement or the likes;
- c. the subject of the document;
- d. person indicated as having received copies;
- e. the purpose for which the document was created and transmitted;
- f. degree of confidentiality with which it was treated both at the time of its

creations and transmission, and since that time; any other facts relative to the elements of the particular privilege asserted.

INTERROGATORY NO. 22: Please state the name of your cellular phone service, the account number and phone number for any phone that you had use of on the day of the accident in question.

INTERROGATORY NO. 23: State whether the automobile you were operating and or in control of at the time of the collision was covered by a liability or umbrella insurance policy. If so, please supply the following information and all policies covering liability arising out of the operation of said automobile:

- a. The name of the liability or casualty insurance company or companies which provided the coverage(s) on said automobile.
- b. The type of coverage had with each of the above named insurance companies.

INTERROGATORY NO. 24: State whether you have been charged with any crimes within the past ten (10) years and if so, the nature of the said crimes, the charge, and the outcome of any related criminal proceeding.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1: Any and all photographs, if any, which relate to this action whether or not intended to be submitted into evidence at the trial of this case or any other proceeding or hearing in this case.

REQUEST FOR PRODUCTION NO. 2: Each and every piece of physical evidence or tangible thing, if any, which relates to this action or was identified in interrogatories propounded to you.

REQUEST FOR PRODUCTION NO. 3: Any and all statements, if any, which relate to this action or were identified in interrogatories propounded to you.

REQUEST FOR PRODUCTION NO. 4: Any and all documents or physical things, if any, which you intend or expect to attempt to introduce at the trial of this case or any other proceeding or hearing in this case.

REQUEST FOR PRODUCTION NO. 5: Any and all reports or documents or physical things of any kind, if any, prepared by, prepared for, or prepared under the supervision of any expert, if any, which relate to this action or were identified by you in interrogatories propounded to you whether or not such expert is expected to testify at the trial of this case or any other proceeding or hearing in this case.

REQUEST FOR PRODUCTION NO. 6: The most current curriculum vita of any expert witness you expect to testify at the trial of this case or any other proceeding or hearing in this case.

REQUEST FOR PRODUCTION NO. 7: Please produce all insurance agreements in existence under which any person or entity carrying on an insurance business may be liable to

satisfy part or all of a judgment which may be entered against you in this action or to indemnify or reimburse any payments made by you to satisfy any such judgment, including the declarations page(s) of said agreements showing the amount of coverage afforded thereunder and the identity of all named insureds to said agreement(s).

REQUEST FOR PRODUCTION NO. 8: Up to the date on which litigation was anticipated, please produce a complete copy of the insurance claim file.

REQUEST FOR PRODUCTION NO. 9: Please produce copies of all documents on which you rely for support of any affirmative defense pled by you in this action or which evidence any facts upon which you base any affirmative defense.

REQUEST FOR PRODUCTION NO. 10: Please produce copies of cell phone records for the date of the collision including a phone call log, text message log and multimedia log.

REQUEST FOR PRODUCTION NO. 10: Please produce copies of any filed claims, fillings, findings, and/or determinations relating to Ms. Lanie Hearn's worker's compensation claim stemming from this accident.

REQUEST FOR PRODUCTION NO. 11: Please produce copies of your pay stubs, time card, identification card, employee id from your employer at the time of the collision referenced in the complaint in this cause of action.

REQUEST FOR ADMISSIONS

1. Please admit that Lanie Hearn filed a worker's compensation claim stemming from the accident subject of the attached complaint.
2. Please admit that Lanie Hearn received worker's compensation benefits as a result of the accident complained of in the attached complaint.

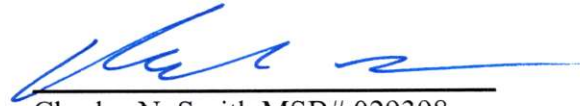
3. Please admit Lanie Hearn is an employee and or agent of your company/llc.
4. Please admit that Lanie Hearn was in fact on the clock at the time of the accident referenced in the Complaint served upon this Defendant.
5. Please admit that Lanie Hearn was acting in furtherance of her duties as an employee of your entity and within the scope of her duties at the time of accident refenced in the Complaint served upon this Defendant.
6. Please admit that Lanier Hearn was at fault in causing the collision described in the complaint.
7. Please admit that Lanie Hearn violated certain TN Statutes and Memphis City Ordinances in causing this collision.
8. Please admit that Daniel Triplett did nothing to cause or contributed to the collision described in the complaint.
9. Please admit that Danie Triplett received injuries as a result of the collision described in the complaint.

Respectfully submitted,

DANIEL TRIPLETT
Chatham Gilder Howell Pittman

By:

Jamie W. Howell, TN# 016361
Attorney for Plaintiff
291 Loshier Street
Hernando, MS 38632
662-429-9871



Charles N. Smith, MSB# 029398
Attorney for Plaintiff
291 Losher Street
Hernando, MS 38632
662-429-9871

CERTIFICATE OF SERVICE

I, Charles N. Smith, attorney for the Plaintiff, do hereby certify that I have this day mailed, postage prepaid, as well as by personal service accompanied with a copy of the Complaint, a true and correct copy of the above and foregoing **PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS AND REQUESTS FOR ADMISSIONS PROPOUNDED TO DEFENDANTS, Lanie D. Hearn, Universal Protection Service, LLC, Michael Stapleton Associates, LTC, Peoplemark, Inc, Peoplemark LLC, ALLIED UNIVERSAL and to Corporation Service Company as their registered agent where appropriate for personal Service to:**

Lanie D. Hearn

2528 Northumberland Ln.
Memphis, TN 38128-4729

UNIVERSAL PROTECTION SERVICE, LLC
1551 N TUSTIN AVE, STE 650,
SANTA ANA, CA 92705-8664
CORPORATION SERVICE COMPANY
2908 POSTON AVE,
NASHVILLE, TN 37203-1312

MICHAEL STAPLETON ASSOCIATES, LTD., CORPORATION
OFFICE OF GENERAL COUNSEL,
9 MURRAY, FL 3,
NEW YORK, NY 10007-2272
CT CORPORATION SYSTEM,
300 MONTVUE RD.,
KNOXVILLE, TN 37919-5546

PEOPLEMARK, INC.
1551 N TUSTIN AVE, STE 650,
SANTA ANA, CA 92705-8664
CORPORATION SERVICE COMPANY,
2908 POSTON AVE,
NASHVILLE, TN 37203-1312

PEOPLEMARK, LLC
1551 N TUSTIN AVE, STE 650,
SANTA ANA, CA 92705-8664
CORPORATION SERVICE COMPANY,
2908 POSTON AVE,
NASHVILLE, TN 37203-1312

ALLIED UNIVERSAL
Eight Tower Bridge,
161 Washington Street Suite 600,
Conshohocken, Pennsylvania 19428
1551 N TUSTIN AVE, STE 650,
SANTA ANA, CA 92705-8664

SO CERTIFIED this the 5th day of ~~April~~ ^{May}, 2022.



Charles N. Smith
Certifying Attorney

(CIRCUIT/CHANCERY) COURT OF TENNESSEE
 140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103
 FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

ELECTRONICALLY FILED
 2022 AUG 09 12:33 PM
 CLERK OF COURT - CIRCUIT

SUMMONS IN CIVIL ACTION

☒ Lawsuit
☐ Divorce

Docket No. _____

Ad Damnum \$ _____

DANIEL TRIPLETT

VS

Lanie D. Hearn;
 UNIVERSAL PROTECTION SERVICE, LLC;
 MICHAEL STAPLETON ASSOCIATES, LTD.,
 CORPORATION;
 PEOPLEMARK, INC.;
 PEOPLEMARK LLC;
 ALLIED UNIVERSAL;
 JOHN DOES A-D

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

AUTOMOBILE CLUB INTER-INSURANCE EXCHANGE
 NAIC CoCode: 15512
 12901 NORTH FORTY DRIVE
 ST LOUIS, MO 63141

Method of Service:

- ☐ Certified Mail
☐ Shelby County Sheriff
☐ Commissioner of Insurance (\$)
☐ Secretary of State (\$)
☐ Other TN County Sheriff (\$)
☐ Private Process Server
☐ Other

(\$ Attach Required Fees

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on Charles N. Smith

Plaintiff's

attorney, whose address is 291 Losher Street, Hernando, MS 38632

telephone 662-429-1027

within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master

TESTED AND ISSUED _____ By _____, D.C.

TO THE DEFENDANT:

NOTICE; Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice:

Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / W. AARON HALL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

_____ 20__

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master By: _____, D.C.

RETURN OF SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I **HAVE** SERVED THE WITHIN SUMMONS:

By delivering on the 27 day of July, 2022 at 9:05A M. a copy of the summons
and a copy of the Complaint to the following Defendant Automobile Club Inter-Insurance Exchange
at % CSC at 109 Executive Dr. Madison MS 39110

Julie Buxton

Signature of person accepting service

Charles Lindsay

By: 

Sheriff or other authorized person to serve process

CHARLES LINDSAY
P.O. BOX 1656
BRANDON, MS 39043
601-941-6348

RETURN OF NON-SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I **HAVE NOT** SERVED THE WITHIN SUMMONS:

To the named Defendant _____

because _____ is (are) not to be found in this County after diligent search and inquiry for the following

reason(s): _____

This _____ day of _____, 20____.

By: _____

Sheriff or other authorized person to serve process



The Shelby County, Tennessee Circuit Court

Case Style: DANIEL TRIPLETT VS LANIE HEARN

Case Number: CT-1752-22

Type: SUMMONS ISSD TO MISC

A handwritten signature in black ink, appearing to read "Marisha D. Allen", is written over a horizontal line.

Marisha Allen, DC

Electronically signed on 05/09/2022 04:04:14 PM

(CIRCUIT/CHANCERY) COURT OF TENNESSEE
 140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103
 FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

ELECTRONICALLY FILED
 2022 Jul 27 10:26 AM
 CLERK OF COURT - CIRCUIT

SUMMONS IN CIVIL ACTION

☒ Lawsuit
☐ Divorce

Docket No. _____

Ad Damnum \$ _____

DANIEL TRIPLETT

VS

Lanie D. Hearn;
 UNIVERSAL PROTECTION SERVICE, LLC;
 MICHAEL STAPLETON ASSOCIATES, LTD.,
 CORPORATION;
 PEOPLEMARK, INC.;
 PEOPLEMARK LLC;
 ALLIED UNIVERSAL;
 JOHN DOES A-D

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

MICHAEL STAPLETON ASSOCIATES, LTD., CORPORATION
 c/o CT CORPORATION SYSTEM
 300 MONTVUE RD.
 KNOXVILLE, TN 37919-5546

Method of Service:

- ☐ Certified Mail
☐ Shelby County Sheriff
☐ Commissioner of Insurance (\$)
☐ Secretary of State (\$)
☐ Other TN County Sheriff (\$)
☐ Private Process Server
☒ Other

(\$ Attach Required Fees

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on Charles N. Smith

Plaintiff's

attorney, whose address is 291 Losher Street, Hernando, MS 38632

telephone 662-429-1027

within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master

TESTED AND ISSUED _____ By _____, D.C.

TO THE DEFENDANT:

NOTICE; Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice:

Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / W. AARON HALL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

20__

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master By: _____, D.C.

RETURN OF SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I **HAVE** SERVED THE WITHIN SUMMONS:

By delivering on the _____ day of _____, 20____ at _____ M. a copy of the summons

and a copy of the Complaint to the following Defendant _____

at _____

Signature of person accepting service

By: _____
Sheriff or other authorized person to serve process

RETURN OF NON-SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I **HAVE NOT** SERVED THE WITHIN SUMMONS:

To the named Defendant _____

because _____ is (are) not to be found in this County after diligent search and inquiry for the following

reason(s): _____

This _____ day of _____, 20_____.

By: _____
Sheriff or other authorized person to serve process



The Shelby County, Tennessee Circuit Court

Case Style: DANIEL TRIPLETT VS LANIE HEARN

Case Number: CT-1752-22

Type: SUMMONS ISSD TO MISC

David Smith, DC

Electronically signed on 07/27/2022 01:54:15 PM

SUMMONS IN CIVIL ACTION

☒ Lawsuit
☐ Divorce

Docket No. _____

Ad Damnum \$ _____

DANIEL TRIPLET

VS

Lanie D. Hearn;
UNIVERSAL PROTECTION SERVICE, LLC;
MICHAEL STAPLETON ASSOCIATES, LTD.,
CORPORATION;
PEOPLEMARK, INC.;
PEOPLEMARK LLC;
ALLIED UNIVERSAL;
JOHN DOES A-D

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

MICHAEL STAPLETON ASSOCIATES, LTD., CORPORATION
c/o CT CORPORATION SYSTEM
300 MONTVUE RD.
KNOXVILLE, TN 37919-5546

Method of Service:

- ☐ Certified Mail
☐ Shelby County Sheriff
☐ Commissioner of Insurance (\$)
☐ Secretary of State (\$)
☐ Other TN County Sheriff (\$)
☐ Private Process Server
☒ Other

(\$) Attach Required Fees

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on **Charles N. Smith**

Plaintiff's

attorney, whose address is **291 Losher Street, Hernando, MS 38632**

telephone **662-429-1027**

within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master

TESTED AND ISSUED _____ By _____, D.C.

TO THE DEFENDANT:

NOTICE; Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice:

Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / W. AARON HALL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

20__

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master By: _____, D.C.

RETURN OF SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE SERVED THE WITHIN SUMMONS:

By delivering on the 28TH day of JULY, 2022 at 12:02 PM. a copy of the summons and a copy of the Complaint to the following Defendant MICHAEL STAPLETON ASSOCIATES/RA C.T. CORP. at 300 MONTVUE ROAD, KNOXVILLE, TN 37919

SAMANTHA SUTTON

Signature of person accepting service

By: [Signature]

Sheriff or other authorized person to serve process

RETURN OF NON-SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE NOT SERVED THE WITHIN SUMMONS:

To the named Defendant _____

because _____ is (are) not to be found in this County after diligent search and inquiry for the following reason(s): _____

This _____ day of _____, 20____.

By: _____

Sheriff or other authorized person to serve process

AFFIDAVIT OF SERVICE

| | | | |
|---|-------------------|---|-----------------|
| Case: | Court: CIRCUIT | County: SHELBY, TN | Job: 7057818 |
| Plaintiff / Petitioner: DANIEL TRIPLETT | | Defendant / Respondent: UNIVERSAL PROTECTION SERVICE, LLC, C/O CORPORATION SERVICE COMPANY | |
| Received by: JUSTIN CASE PROCESS AND INVESTIGATIONS | | For: CHATHAM GILDER HOWELL PITTMAN | |
| To be served upon: ALLIED UNIVERSAL, C/O CORPORATION SERVICE COMPANY | | | |

I, RICKY COOPER, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

Recipient Name / Address: ALLIED UNIVERSAL, C/O CORPORATION SERVICE COMPANY, 2908 Poston Ave, Nashville, TN 37203

Manner of Service: Registered Agent, May 10, 2022, 1:00 pm CDT

Documents: SUMMONS AND COMPLAINT; NOTICE OF FILING DISCOVERY; PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS AND REQUESTS FOR ADMISSION PROPOUNDED TO DEFENDANTS, LANIE D. HEARN; UNIVERSAL PROTECTION SERVICE, LLC; MICHAEL STAPLETON ASSOCIATES, LTD., CORPORATION; PEOPLEMARK, INC.; PEOPLEMARK LLC; ALLIED UNIVERSAL; AND JOHN DOES (Received May 9, 2022 at 12:00am CDT)

Additional Comments:

1) Successful Attempt: May 10, 2022, 1:00 pm CDT at 2908 Poston Ave, Nashville, TN 37203 received by ALLIED UNIVERSAL, C/O CORPORATION SERVICE COMPANY. Age: 50; Ethnicity: Caucasian; Gender: Female; Height: 5'; Hair: Brown; Hand delivered to Cindy Mayle, at the front desk of Registered Agent Corporation Service Company.

Ricky Cooper 5-15-22
RICKY COOPER Date

JUSTIN CASE PROCESS AND INVESTIGATIONS
2817 W End Ave SUITE 126-472
Nashville, TN 37203

Subscribed and sworn to before me by the affiant who is personally known to me.

Carol Malone
Notary Public
5/15/22 7/3/23
Date Commission Expires



(CIRCUIT/CHANCERY) COURT OF TENNESSEE
140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

ELECTRONICALLY FILED
2022 May 05 2:30 PM
CLERK OF COURT - CIRCUIT

SUMMONS IN CIVIL ACTION

Docket No. _____

☒ Lawsuit
☐ Divorce

Ad Damnum \$ _____

DANIEL TRIPLETT

VS

Lania D. Hearn;
UNIVERSAL PROTECTION SERVICE, LLC;
MICHAEL STAPLETON ASSOCIATES, LTD.,
CORPORATION;
PEOPLEMARK, INC.;
PEOPLEMARK LLC;
ALLIED UNIVERSAL;
JOHN DOES A-D

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

ALLIED UNIVERSAL
c/o CORPORATION SERVICE COMPANY
2908 POSTON AVE,
NASHVILLE, TN 37203-1312

Method of Service:

- ☐ Certified Mail
☐ Shelby County Sheriff
☐ Commissioner of Insurance (\$)
☐ Secretary of State (\$)
☐ Other TN County Sheriff (\$)
☐ Private Process Server
☐ Other

(\$ Attach Required Fees

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on Charles N. Smith

Plaintiff's

attorney, whose address is 291 Loshier Street, Hernando, MS 38632

telephone 662-429-1027 within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master

TESTED AND ISSUED _____ By _____, D.C.

TO THE DEFENDANT:

NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice:

Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / W. AARON HALL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

_____ 20__

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master By: _____, D.C.

| RETURN OF SERVICE OF SUMMONS | |
|--|--|
| I HEREBY CERTIFY THAT I <u>HAVE</u> SERVED THE WITHIN SUMMONS: | |
| By delivering on the <u>10th</u> day of <u>MAY</u> , 20 <u>22</u> at <u>1:00 P</u> M. a copy of the summons | |
| and a copy of the Complaint to the following Defendant <u>Allied Universal CP Corporation Service Company</u> | |
| at <u>2908 POSTON Ave Nashville, TN 37203</u> | |
| Signature of person accepting service | By: <u>Rusty Cooper, Process Server</u> Sheriff or other authorized person to serve process |

Justin Case Process & Investigations
2817 West End Ave
#126-472
Nashville, TN 37203
615-517-0848

| RETURN OF NON-SERVICE OF SUMMONS | |
|---|--|
| I HEREBY CERTIFY THAT I <u>HAVE NOT</u> SERVED THE WITHIN SUMMONS: | |
| To the named Defendant _____ | |
| because _____ is (are) not to be found in this County after diligent search and inquiry for the following | |
| reason(s): _____ | |
| This _____ day of _____, 20_____. | |
| | By: _____ Sheriff or other authorized person to serve process |

(CIRCUIT/CHANCERY) COURT OF TENNESSEE
140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

ELECTRONICALLY FILED
2022 May 18 11:27 AM
CLERK OF COURT - CIRCUIT
2022 May 05 2:30 PM
CLERK OF COURT - CIRCUIT

SUMMONS IN CIVIL ACTION

Docket No. _____

☒ Lawsuit
☐ Divorce

Ad Damnum \$ _____

DANIEL TRIPLETT

VS

Lanie D. Hearn;
UNIVERSAL PROTECTION SERVICE, LLC;
MICHAEL STAPLETON ASSOCIATES, LTD.,
CORPORATION;
PEOPLEMARK, INC.;
PEOPLEMARK LLC;
ALLIED UNIVERSAL;
JOHN DOES A-D

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

Lanie D. Hearn
2528 Northumberland Lane
Memphis, TN 38128-4729

Method of Service:

☐ Certified Mail
☐ Shelby County Sheriff
☐ Commissioner of Insurance (\$)
☐ Secretary of State (\$)
☐ Other TN County Sheriff (\$)
☐ Private Process Server
☐ Other

(\$ Attach Required Fees

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on Charles N. Smith

Plaintiff's

attorney, whose address is 291 Losher Street, Hernando, MS 38632

telephone 662-429-1027

within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master

TESTED AND ISSUED _____ By _____, D.C.

TO THE DEFENDANT:

NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice:

Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / W. AARON HALL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

20__

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master By: _____, D.C.

RETURN OF SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE SERVED THE WITHIN SUMMONS:

By delivering on the 14 day of MAY, 2022 at 9:05 AM M. a copy of the summons
and a copy of the Complaint to the following Defendant LAWIE D HEARN
at 6928 Bishops Valley Lane Bartlett TN

✓ Refused to sign

Signature of person accepting service

By: [Signature]
Sheriff or other authorized person to serve process

RETURN OF NON-SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE NOT SERVED THE WITHIN SUMMONS:

To the named Defendant _____
because _____ is (are) not to be found in this County after diligent search and inquiry for the following
reason(s): _____

This _____ day of _____, 20____.

By: _____
Sheriff or other authorized person to serve process

5/14/22
9:05 AM
DIS

1. The first step is to identify the

2. The second step is to identify the

3. The third step is to identify the

4. The fourth step is to identify the

5. The fifth step is to identify the

6. The sixth step is to identify the

7. The seventh step is to identify the



The Shelby County, Tennessee Circuit Court

Case Style: DANIEL TRIPLETT VS LANIE HEARN
Case Number: CT-1752-22
Type: SUMMONS ISSD TO MISC

David Smith, DC

Electronically signed on 05/05/2022 02:36:54 PM

AFFIDAVIT OF SERVICE

| | | | |
|---|--------------------------|--|------------------------|
| Case: | Court: CIRCUIT | County: SHELBY, TN | Job: 7057823 |
| Plaintiff / Petitioner: DANIEL TRIPLETT | | Defendant / Respondent: UNIVERSAL PROTECTION SERVICE, LLC, C/O CORPORATION SERVICE COMPANY | |
| Received by: JUSTIN CASE PROCESS AND INVESTIGATIONS | | For: CHATHAM GILDER HOWELL PITTMAN | |
| To be served upon: UNIVERSAL PROTECTION SERVICE, LLC, C/O CORPORATION SERVICE COMPANY | | | |

I, RICKY COOPER, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

Recipient Name / Address: UNIVERSAL PROTECTION SERVICE, LLC, C/O CORPORATION SERVICE COMPANY, 2908 Poston Ave, Nashville, TN 37203

Manner of Service: Registered Agent, May 10, 2022, 1:00 pm CDT

Documents: SUMMONS AND COMPLAINT; NOTICE OF FILING DISCOVERY; PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS AND REQUESTS FOR ADMISSION PROPOUNDED TO DEFENDANTS, LANIE D. HEARN; UNIVERSAL PROTECTION SERVICE, LLC; MICHAEL STAPLETON ASSOCIATES, LTD., CORPORATION; PEOPLEMARK, INC.; PEOPLEMARK LLC; ALLIED UNIVERSAL; AND JOHN DOES (Received May 9, 2022 at 12:00am CDT)

Additional Comments:

1) Successful Attempt: May 10, 2022, 1:00 pm CDT at 2908 Poston Ave, Nashville, TN 37203 received by UNIVERSAL PROTECTION SERVICE, LLC, C/O CORPORATION SERVICE COMPANY. Age: 50; Ethnicity: Caucasian; Gender: Female; Height: 5'; Hair: Brown; Hand delivered to Cindy Mayle, at the front desk of Registered Agent Corporation Service Company

Ricky Cooper 5-15-22
RICKY COOPER Date

JUSTIN CASE PROCESS AND INVESTIGATIONS
2817 W End Ave SUITE 126-472
Nashville, TN 37203

Subscribed and sworn to before me by the affiant who is personally known to me.

Carol Malone
Notary Public
5/15/22 7/3/23
Date Commission Expires



(CIRCUIT/CHANCERY) COURT OF TENNESSEE
140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

ELECTRONICALLY FILED
2022 May 05 2:48 PM
CLERK OF COURT - CIRCUIT

SUMMONS IN CIVIL ACTION

☒ Lawsuit
☐ Divorce

Docket No. _____

Ad Damnum \$ _____

DANIEL TRIPLETT

VS

Lanie D. Hearn;
UNIVERSAL PROTECTION SERVICE, LLC;
MICHAEL STAPLETON ASSOCIATES, LTD.,
CORPORATION;
PEOPLEMARK, INC.;
PEOPLEMARK LLC;
ALLIED UNIVERSAL;
JOHN DOES A-D

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

UNIVERSAL PROTECTION SERVICE, LLC.
c/o CORPORATION SERVICE COMPANY,
2908 POSTON AVE.
NASHVILLE, TN 37203-1312

Method of Service:

- ☐ Certified Mail
☐ Shelby County Sheriff
☐ Commissioner of Insurance (\$)
☐ Secretary of State (\$)
☐ Other TN County Sheriff (\$)
☐ Private Process Server
☐ Other

(\$ Attach Required Fees

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on Charles N. Smith

Plaintiff's

attorney, whose address is 291 Loshier Street, Hernando, MS 38632

telephone 662-429-1027

within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master

TESTED AND ISSUED _____ By _____, D.C.

TO THE DEFENDANT:

NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice:

Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / W. AARON HALL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

20__

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master By: _____, D.C.

RETURN OF SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE SERVED THE WITHIN SUMMONS:

By delivering on the 10th day of May, 2022 at 1:00 P M. a copy of the summons
and a copy of the Complaint to the following Defendant Universal Protection Service, Inc. c/o Corporation
at 2908 Postaw Ave Nashville, TN Service
Company

Signature of person accepting service

By:

Ruby Cooper

Sheriff or other authorized person to serve process

Justin Case Process & Investigations

2817 West End Ave

#126-472

Nashville, TN 37203

615-517-0848

RETURN OF NON-SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE NOT SERVED THE WITHIN SUMMONS:

To the named Defendant _____

because _____ is (are) not to be found in this County after diligent search and inquiry for the following

reason(s): _____

This _____ day of _____, 20 _____

By: _____

Sheriff or other authorized person to serve process

(CIRCUIT/CHANCERY) COURT OF TENNESSEE
140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHISELECTRONICALLY FILED
2022 Jul 27 10:26 AM
CLERK OF COURT - CIRCUIT

SUMMONS IN CIVIL ACTION

Docket No. _____

☒ Lawsuit
☐ Divorce

Ad Damnum \$ _____

DANIEL TRIPLETT

VS

Lanie D. Hearn;
UNIVERSAL PROTECTION SERVICE, LLC;
MICHAEL STAPLETON ASSOCIATES, LTD.,
CORPORATION;
PEOPLEMARK, INC.;
PEOPLEMARK, LLC;
ALLIED UNIVERSAL;
JOHN DOES A-D

Plaintiff(s)

Defendant(s)

TO (Name and Address of Defendant (One defendant per summons))

Method of Service

PEOPLEMARK, INC.;
c/o CORPORATION SERVICE COMPANY
2908 POSTON AVE,
NASHVILLE, TN 37203-1312

- ☐
- Certified Mail
-
- ☐
- Shelby County Sheriff
-
- ☐
- Commissioner of Insurance (\$)
-
- ☐
- Secretary of State (\$)
-
- ☐
- Other TN County Sheriff (\$)
-
- ☐
- Private Process Server
-
- ☒
- Other

(\$ Attach Required Fees

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on Charles N. Smith

Plaintiff's

attorney, whose address is 291 Loshier Street, Hernando, MS 38632

telephone 662-429-1027

within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master

TESTED AND ISSUED _____ By _____, D.C.

TO THE DEFENDANT:

NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice: Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / W. AARON HALL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

20__

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master By: _____, D.C.

| RETURN OF SERVICE OF SUMMONS | |
|--|--|
| I HEREBY CERTIFY THAT I <u>HAVE</u> SERVED THE WITHIN SUMMONS: | |
| By delivering on the <u>29th</u> day of <u>July</u> , 20 <u>22</u> at <u>12:55 p.m.</u> a copy of the summons | |
| and a copy of the Complaint to the following Defendant <u>People Mark, Inc. % Corporation Service Company</u> | |
| at <u>2908 Pastor Ave Nashville, TN 37203</u> | |
| Signature of person accepting service | By: <u>Randy Cooper, Process Server</u> Sheriff or other authorized person to serve process |

| RETURN OF NON-SERVICE OF SUMMONS |
|---|
| I HEREBY CERTIFY THAT I <u>HAVE NOT</u> SERVED THE WITHIN SUMMONS: |
| To the named Defendant _____ |
| because _____ is (are) not to be found in this County after diligent search and inquiry for the following |
| reason(s): _____ |
| This _____ day of _____, 20 _____ |
| By: _____ Sheriff or other authorized person to serve process |

(CIRCUIT/CHANCERY) COURT OF TENNESSEE
140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHISELECTRONICALLY FILED
2022 Jul 27 10:26 AM
CLERK OF COURT - CIRCUIT

SUMMONS IN CIVIL ACTION

Docket No. _____

☒ Lawsuit
☐ Divorce

Ad Damnum \$ _____

DANIEL TRIPLETT

VS

Lanie D. Hearn;
UNIVERSAL PROTECTION SERVICE, LLC;
MICHAEL STAPLETON ASSOCIATES, LTD.,
CORPORATION;
PEOPLEMARK, INC.;
PEOPLEMARK LLC;
ALLIED UNIVERSAL;
JOHN DOES A-D

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

PEOPLEMARK, LLC
c/o CORPORATION SERVICE COMPANY
2908 POSTON AVE,
NASHVILLE, TN 37203-1312

Method of Service:

- ☐
- Certified Mail
-
- ☐
- Shelby County Sheriff
-
- ☐
- Commissioner of Insurance (\$)
-
- ☐
- Secretary of State (\$)
-
- ☐
- Other TN County Sheriff (\$)
-
- ☐
- Private Process Server
-
- ☒
- Other

(\$ Attach Required Fees

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on Charles N. Smith

Plaintiff's

attorney, whose address is 291 Loshier Street, Hernando, MS 38632

telephone 662-429-1027

within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master

TESTED AND ISSUED _____

By _____ D.C.

TO THE DEFENDANT:

NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice: Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / W. AARON HALL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

20__

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master By: _____ D.C.

| RETURN OF SERVICE OF SUMMONS | |
|--|---|
| I HEREBY CERTIFY THAT I <u>HAVE</u> SERVED THE WITHIN SUMMONS: | |
| By delivering on the <u>29th</u> day of <u>July</u> | 20 <u>22</u> at <u>12:55 P</u> M. a copy of the summons |
| and a copy of the Complaint to the following Defendant <u>Peplemark LLC, % Corporation Service Company</u> | |
| at <u>2908 Pastor Ave Nashville, TN 37203</u> | |
| Signature of person accepting service _____ | By: <u>Ruby Cooper, Process Server</u> Sheriff or other authorized person to serve process |

| RETURN OF NON-SERVICE OF SUMMONS | |
|---|--|
| I HEREBY CERTIFY THAT I <u>HAVE NOT</u> SERVED THE WITHIN SUMMONS: | |
| To the named Defendant _____ | |
| because _____ is (are) not to be found in this County after diligent search and inquiry for the following | |
| reason(s): _____ | |
| This _____ day of _____, 20 _____ | |
| By: _____ Sheriff or other authorized person to serve process | |

(CIRCUIT/CHANCERY) COURT OF TENNESSEE
140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHISELECTRONICALLY FILED
2022 May 09 12:33 PM
CLERK OF COURT - CIRCUIT

SUMMONS IN CIVIL ACTION

☒ Lawsuit
☐ Divorce

Docket No. _____

Ad Damnum \$ _____

DANIEL TRIPLETT

VS

Lanie D. Hearn;
UNIVERSAL PROTECTION SERVICE, LLC;
MICHAEL STAPLETON ASSOCIATES, LTD.,
CORPORATION;
PEOPLEMARK, INC.;
PEOPLEMARK LLC;
ALLIED UNIVERSAL;
JOHN DOES A-D

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

AUTOMOBILE CLUB INTER-INSURANCE EXCHANGE
NAIC CoCode: 15512
12901 NORTH FORTY DRIVE
ST LOUIS, MO 63141

Method of Service:

- ☐
- Certified Mail
-
- ☐
- Shelby County Sheriff
-
- ☐
- Commissioner of Insurance (\$)
-
- ☐
- Secretary of State (\$)
-
- ☐
- Other TN County Sheriff (\$)
-
- ☐
- Private Process Server
-
- ☐
- Other

(\$ Attach Required Fees)

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on Charles N. Smith

Plaintiff's

attorney, whose address is 291 Losher Street, Hernando, MS 38632

telephone 662-429-1027

within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master

TESTED AND ISSUED _____ By _____, D.C.

TO THE DEFENDANT:

NOTICE; Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice:

Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / W. AARON HALL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

_____ 20__

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master By: _____, D.C.

RETURN OF SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE SERVED THE WITHIN SUMMONS:

By delivering on the _____ day of _____, 20____ at _____ M. a copy of the summons
and a copy of the Complaint to the following Defendant _____
at _____

Signature of person accepting service

By: _____
Sheriff or other authorized person to serve process

RETURN OF NON-SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE NOT SERVED THE WITHIN SUMMONS:

To the named Defendant _____
because _____ is (are) not to be found in this County after diligent search and inquiry for the following
reason(s): _____

This _____ day of _____, 20_____.

By: _____
Sheriff or other authorized person to serve process



The Shelby County, Tennessee Circuit Court

Case Style: DANIEL TRIPLETT VS LANIE HEARN

Case Number: CT-1752-22

Type: SUMMONS ISSD TO MISC

Marisha Allen, DC

Electronically signed on 05/09/2022 04:04:14 PM

(CIRCUIT/CHANCERY) COURT OF TENNESSEE
 140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103
 FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

ELECTRONICALLY FILED
 2022 May 05 2:30 PM
 CLERK OF COURT - CIRCUIT

SUMMONS IN CIVIL ACTION

☒ Lawsuit
☐ Divorce

Docket No. _____

Ad Damnum \$ _____

DANIEL TRIPLETT

VS

Lanie D. Hearn;
 UNIVERSAL PROTECTION SERVICE, LLC;
 MICHAEL STAPLETON ASSOCIATES, LTD.,
 CORPORATION;
 PEOPLEMARK, INC.;
 PEOPLEMARK LLC;
 ALLIED UNIVERSAL;
 JOHN DOES A-D

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

ALLIED UNIVERSAL
 c/o CORPORATION SERVICE COMPANY
 2908 POSTON AVE,
 NASHVILLE, TN 37203-1312

Method of Service:

- ☐ Certified Mail
☐ Shelby County Sheriff
☐ Commissioner of Insurance (\$)
☐ Secretary of State (\$)
☐ Other TN County Sheriff (\$)
☐ Private Process Server
☐ Other

(\$ Attach Required Fees

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on Charles N. Smith

Plaintiff's

attorney, whose address is 291 Losher Street, Hernando, MS 38632

telephone 662-429-1027

within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master

TESTED AND ISSUED _____ By _____, D.C.

TO THE DEFENDANT:

NOTICE; Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice:

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FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / W. AARON HALL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

20__

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master By: _____, D.C.

RETURN OF SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I **HAVE** SERVED THE WITHIN SUMMONS:

By delivering on the _____ day of _____, 20____ at _____ M. a copy of the summons
and a copy of the Complaint to the following Defendant _____
at _____

Signature of person accepting service

By: _____
Sheriff or other authorized person to serve process

RETURN OF NON-SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I **HAVE NOT** SERVED THE WITHIN SUMMONS:

To the named Defendant _____
because _____ is (are) not to be found in this County after diligent search and inquiry for the following
reason(s): _____

This _____ day of _____, 20_____.

By: _____
Sheriff or other authorized person to serve process



The Shelby County, Tennessee Circuit Court

Case Style: DANIEL TRIPLETT VS LANIE HEARN

Case Number: CT-1752-22

Type: SUMMONS ISSD TO MISC

David Smith, DC

Electronically signed on 05/05/2022 02:36:54 PM

(CIRCUIT/CHANCERY) COURT OF TENNESSEE
140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHISELECTRONICALLY FILED
2022 Jul 27 10:26 AM
CLERK OF COURT - CIRCUIT

SUMMONS IN CIVIL ACTION

☒ Lawsuit
☐ Divorce

Docket No. _____

Ad Damnum \$ _____

DANIEL TRIPLETT

VS

Lanie D. Hearn;
UNIVERSAL PROTECTION SERVICE, LLC;
MICHAEL STAPLETON ASSOCIATES, LTD.,
CORPORATION;
PEOPLEMARK, INC.;
PEOPLEMARK LLC;
ALLIED UNIVERSAL;
JOHN DOES A-D

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

PEOPLEMARK, INC.;
c/o CORPORATION SERVICE COMPANY
2908 POSTON AVE,
NASHVILLE, TN 37203-1312

Method of Service:

- ☐
- Certified Mail
-
- ☐
- Shelby County Sheriff
-
- ☐
- Commissioner of Insurance (\$)
-
- ☐
- Secretary of State (\$)
-
- ☐
- Other TN County Sheriff (\$)
-
- ☐
- Private Process Server
-
- ☒
- Other

(\$ Attach Required Fees)

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on Charles N. Smith

Plaintiff's

attorney, whose address is 291 Losher Street, Hernando, MS 38632

telephone 662-429-1027

within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master

TESTED AND ISSUED _____ By _____, D.C.

TO THE DEFENDANT:

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FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / W. AARON HALL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

20__

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master By: _____, D.C.

RETURN OF SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I **HAVE** SERVED THE WITHIN SUMMONS:

By delivering on the _____ day of _____, 20____ at _____ M. a copy of the summons
and a copy of the Complaint to the following Defendant _____
at _____

Signature of person accepting service

By: _____
Sheriff or other authorized person to serve process

RETURN OF NON-SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I **HAVE NOT** SERVED THE WITHIN SUMMONS:

To the named Defendant _____
because _____ is (are) not to be found in this County after diligent search and inquiry for the following
reason(s): _____

This _____ day of _____, 20_____.

By: _____
Sheriff or other authorized person to serve process



The Shelby County, Tennessee Circuit Court

Case Style: DANIEL TRIPLETT VS LANIE HEARN

Case Number: CT-1752-22

Type: SUMMONS ISSD TO MISC

A handwritten signature in blue ink, appearing to read "DS", is positioned above the name "David Smith, DC".

David Smith, DC

Electronically signed on 07/27/2022 01:54:15 PM

(CIRCUIT/CHANCERY) COURT OF TENNESSEE
140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHISELECTRONICALLY FILED
2022 May 05 2:30 PM
CLERK OF COURT - CIRCUIT

SUMMONS IN CIVIL ACTION

☒ Lawsuit
☐ Divorce

Docket No. _____

Ad Damnum \$ _____

DANIEL TRIPLETT

VS

Lanie D. Hearn;
UNIVERSAL PROTECTION SERVICE, LLC;
MICHAEL STAPLETON ASSOCIATES, LTD.,
CORPORATION;
PEOPLEMARK, INC.;
PEOPLEMARK LLC;
ALLIED UNIVERSAL;
JOHN DOES A-D

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

Lanie D. Hearn
2528 Northumberland Lane
Memphis, TN 38128-4729

Method of Service:

- ☐
- Certified Mail
-
- ☐
- Shelby County Sheriff
-
- ☐
- Commissioner of Insurance (\$)
-
- ☐
- Secretary of State (\$)
-
- ☐
- Other TN County Sheriff (\$)
-
- ☐
- Private Process Server
-
- ☐
- Other

(\$ Attach Required Fees)

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on Charles N. Smith

Plaintiff's

attorney, whose address is 291 Losher Street, Hernando, MS 38632

telephone 662-429-1027

within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master

TESTED AND ISSUED _____ By _____, D.C.

TO THE DEFENDANT:

NOTICE; Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice:

Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / W. AARON HALL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

20__

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master By: _____, D.C.

RETURN OF SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I **HAVE** SERVED THE WITHIN SUMMONS:

By delivering on the _____ day of _____, 20____ at _____ M. a copy of the summons
and a copy of the Complaint to the following Defendant _____
at _____

Signature of person accepting service

By: _____
Sheriff or other authorized person to serve process

RETURN OF NON-SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I **HAVE NOT** SERVED THE WITHIN SUMMONS:

To the named Defendant _____
because _____ is (are) not to be found in this County after diligent search and inquiry for the following
reason(s): _____

This _____ day of _____, 20_____.

By: _____
Sheriff or other authorized person to serve process



The Shelby County, Tennessee Circuit Court

Case Style: DANIEL TRIPLETT VS LANIE HEARN

Case Number: CT-1752-22

Type: SUMMONS ISSD TO MISC

David Smith, DC

Electronically signed on 05/05/2022 02:36:54 PM

(CIRCUIT/CHANCERY) COURT OF TENNESSEE
 140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103
 FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

ELECTRONICALLY FILED
 2022 Jul 27 10:26 AM
 CLERK OF COURT - CIRCUIT

SUMMONS IN CIVIL ACTION

☒ Lawsuit
☐ Divorce

Docket No. _____

Ad Damnum \$ _____

DANIEL TRIPLETT

VS

Lanie D. Hearn;
 UNIVERSAL PROTECTION SERVICE, LLC;
 MICHAEL STAPLETON ASSOCIATES, LTD.,
 CORPORATION;
 PEOPLEMARK, INC.;
 PEOPLEMARK LLC;
 ALLIED UNIVERSAL;
 JOHN DOES A-D

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

PEOPLEMARK, LLC
 c/o CORPORATION SERVICE COMPANY
 2908 POSTON AVE,
 NASHVILLE, TN 37203-1312

Method of Service:

- ☐ Certified Mail
☐ Shelby County Sheriff
☐ Commissioner of Insurance (\$)
☐ Secretary of State (\$)
☐ Other TN County Sheriff (\$)
☐ Private Process Server
☒ Other

(\$ Attach Required Fees

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on Charles N. Smith

Plaintiff's

attorney, whose address is 291 Losher Street, Hernando, MS 38632

telephone 662-429-1027

within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master

TESTED AND ISSUED _____ By _____, D.C.

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TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master By: _____, D.C.

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The Shelby County, Tennessee Circuit Court

Case Style: DANIEL TRIPLETT VS LANIE HEARN

Case Number: CT-1752-22

Type: SUMMONS ISSD TO MISC

David Smith, DC

Electronically signed on 07/27/2022 01:54:15 PM

(CIRCUIT/CHANCERY) COURT OF TENNESSEE
 140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103
 FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

ELECTRONICALLY FILED
 2022 May 05 2:48 PM
 CLERK OF COURT - CIRCUIT

SUMMONS IN CIVIL ACTION

☒ Lawsuit
☐ Divorce

Docket No. _____

Ad Damnum \$ _____

DANIEL TRIPLETT

VS

Lanie D. Hearn;
 UNIVERSAL PROTECTION SERVICE, LLC;
 MICHAEL STAPLETON ASSOCIATES, LTD.,
 CORPORATION;
 PEOPLEMARK, INC.;
 PEOPLEMARK LLC;
 ALLIED UNIVERSAL;
 JOHN DOES A-D

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

UNIVERSAL PROTECTION SERVICE, LLC.
 c/o CORPORATION SERVICE COMPANY,
 2908 POSTON AVE,
 NASHVILLE, TN 37203-1312

Method of Service:

- ☐ Certified Mail
☐ Shelby County Sheriff
☐ Commissioner of Insurance (\$)
☐ Secretary of State (\$)
☐ Other TN County Sheriff (\$)
☐ Private Process Server
☐ Other

(\$ Attach Required Fees

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The Shelby County, Tennessee Circuit Court

Case Style: DANIEL TRIPLETT VS LANIE HEARN

Case Number: CT-1752-22

Type: SUMMONS ISSD TO MISC

Deputy Clerk Antwain D Carter, DC

Electronically signed on 05/05/2022 03:18:18 PM